

NEWPORT COUNTY SUPERIOR COURT

SC DOCKET SHEET**CASE No. NC-2023-0376**

Jane Doe
v.
Marriott International, Inc. et al.

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Location: **Newport County Superior Court**
 Filed on: **10/26/2023**

CASE INFORMATION**Statistical Closures**

11/20/2023 Closed-Non-Trial-Unassigned-Remanded to District Court

Case Type: **Civil Rights/Job Discrimination**

Case
 Status: **11/20/2023 Closed**

Case Flags: **Claim for Jury Trial****DATE****CASE ASSIGNMENT****Current Case Assignment**

Case Number NC-2023-0376
 Court Newport County Superior Court
 Date Assigned 10/26/2023

PARTY INFORMATION

Plaintiff **Doe, Jane**

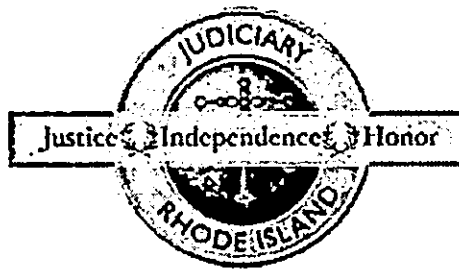
Lead Attorneys

MULLER, CHIP
Retained
 4012565171(W)

Defendant **Host Marriott Corporation**
Marriott Hotel Services, LLC
Marriott International, Inc.

DATE**EVENTS & ORDERS OF THE COURT**

11/20/2023 Closed-Non-Trial-Unassigned-Remanded to District Court
 11/20/2023 Case Removed to US District Court
 11/20/2023 Notice of Removal
 11/06/2023  Summons Proof of Service Filed
Marriott Hotel Services, LLC Served Summons
 11/06/2023  Proof of Service Filed
Marriott International, Inc. Served Summons
 11/06/2023  Summons Proof of Service Filed
Host Marriott Corporation Served Summons
 10/27/2023  Claim of Jury Trial Filed
Plaintiff's Demand for Jury Trial
 10/27/2023  Summons
 10/26/2023  Complaint Filed
Complaint



STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS

CLERK'S CERTIFICATE AND TRANSMITTAL OF THE RECORD


Case Information

Case Caption: Jane Doe vs. Marriott International, Inc
Federal Court Case No. 1:23-cv-00487 State Court Case No. NC-2023-0376

Record Information

Confidential: Yes ☐ No ☒ Description: _____
Sealed documents: Yes ☐ No ☒ Description: _____

Certification

I, John Graziano, Clerk of the Rhode Island Superior Court for the County of
Newport  do certify that the attached documents are all the documents
included in the record in the above referenced case.

Date: Nov/20/2023

Clerk:

/s/ John Graziano

Prepared by:

/s/ William Van Wormer



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Civil Action File Number NC-2023-0376
	Attorney for the Plaintiff or the Plaintiff Chip Muller
	Address of the Plaintiff's Attorney or the Plaintiff MULLER LAW LLC 47 WOOD AVENUE BARRINGTON RI 02806
Murray Judicial Complex Newport County 45 Washington Square Newport RI 02840 (401) 841-8330	Address of the Defendant 10400 Fernwood Road Bethesda MD 20817

TO THE DEFENDANT, Marriott Hotel Services, LLC:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 10/27/2023.	/s/ John Graziano Clerk
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Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND JUDICIARY

SUPERIOR COURT

Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Civil Action File Number NC-2023-0376
---	---

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Marriott Hotel Services, LLC, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion _____
Address of dwelling house or usual place of abode _____
Age _____
Relationship to the Defendant _____
- ☒ With an agent authorized by appointment or by law to receive service of process.
Name of authorized agent CT Corp Samantha Doyle
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.
Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY

SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.
_____☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE:

11 / 1 / 23 10:10AM
Month Day Year

SERVICE FEE \$ _____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

Shirley Carrs 6095

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary
 or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence,
 and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Civil Action File Number NC-2023-0376
	Attorney for the Plaintiff or the Plaintiff Chip Muller
	Address of the Plaintiff's Attorney or the Plaintiff MULLER LAW LLC 47 WOOD AVENUE BARRINGTON RI 02806
Murray Judicial Complex Newport County 45 Washington Square Newport RI 02840 (401) 841-8330	Address of the Defendant 7750 Wisconsin Avenue Bethesda MD 20814

TO THE DEFENDANT, Marriott International, Inc.:

The above-named Plaintiff has brought an action against you, as indicated above. You are hereby summoned and required to appear at the address is listed above, an answer to the complaint which is heretofore filed, within the days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you on the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, if the complaint is for damage arising out of your ownership, possession, use, or control of a vehicle, or unless otherwise provided in Rule 13(a), your answer must include any claim which you may have against the Plaintiff, or you will be barred from asserting any other action.

This Summons was generated on 10/27/2023.	/s/ John Graziano Clerk
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Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Civil Action File Number NC-2023-0376
---	---

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Marriott International, Inc., by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion _____
Address of dwelling house or usual place of abode _____
Age _____
Relationship to the Defendant _____
- ☒ With an agent authorized by appointment or by law to receive service of process.
Name of authorized agent CT Corp Samantha Doyle
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below. _____
- ☐ With a guardian or conservator of the Defendant.
Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: 11/1/23 10:10 AM SERVICE FEE \$ _____
Month Day Year

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

Sgt. Cain 6075

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____
County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____
My commission expires: _____
Notary identification number: _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Civil Action File Number NC-2023-0376
	Attorney for the Plaintiff or the Plaintiff Chip Muller
	Address of the Plaintiff's Attorney or the Plaintiff MULLER LAW LLC 47 WOOD AVENUE BARRINGTON RI 02806
Murray Judicial Complex Newport County 45 Washington Square Newport RI 02840 (401) 841-8330	Address of the Defendant 10400 Fernwood Road Bethesda MD 20817

TO THE DEFENDANT, Host Marriott Corporation: *AFS Prentice-Hall corp systems*

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 10/27/2023.	/s/ John Graziano Clerk
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Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND JUDICIARY

SUPERIOR COURT

Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Civil Action File Number NC-2023-0376
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PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Host Marriott Corporation, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion _____
Address of dwelling house or usual place of abode _____
Age _____
Relationship to the Defendant _____
- ☒ With an agent authorized by appointment or by law to receive service of process.
Name of authorized agent Chris Bersner Corporation Service Co.
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.
Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY

SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: 11/1/23 1:37 PM SERVICE FEE \$ _____
 Month Day Year

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

Sej Cain 6095

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary
 or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence,
 and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____

STATE OF RHODE ISLAND
NEWPORT, SC.

SUPERIOR COURT

JANE DOE,
Plaintiff,

v.

C.A. No. NC2023-376

MARRIOTT INTERNATIONAL, INC.,
HOST MARRIOTT CORPORATION, and
MARRIOTT HOTEL SERVICES, LCC.,
Defendants.

DEMAND FOR JURY TRIAL

The Plaintiff hereby demands a trial by jury on all counts so triable.

Plaintiff,
JANE DOE,
By her Counsel,

/s/ Chip Muller
Chip Muller, Esq. (#7686)
Muller Law, LLC
47 Wood Avenue
Barrington, RI 02806
(401) 256-5171 (ph.)
chip@mullerlaw.com

Dated: October 26, 2023



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Civil Action File Number NC-2023-0376	
Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Attorney for the Plaintiff or the Plaintiff Chip Muller Address of the Plaintiff's Attorney or the Plaintiff MULLER LAW LLC 47 WOOD AVENUE BARRINGTON RI 02806
Murray Judicial Complex Newport County 45 Washington Square Newport RI 02840 (401) 841-8330	Address of the Defendant 10400 Fernwood Road Bethesda MD 20817

TO THE DEFENDANT, Marriott Hotel Services, LLC:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 10/27/2023.

/s/ John Graziano
Clerk

Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Plaintiff

Jane Doe

v.

Marriott International, Inc. et al.

Defendant**Civil Action File Number**

NC-2023-0376

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Marriott Hotel Services, LLC, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion _____
Address of dwelling house or usual place of abode _____
Age _____
Relationship to the Defendant _____
- ☐ With an agent authorized by appointment or by law to receive service of process.
Name of authorized agent _____
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.
Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY

SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: _____ / _____ / _____
Month Day Year

SERVICE FEE \$ _____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Civil Action File Number NC-2023-0376	
Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Attorney for the Plaintiff or the Plaintiff Chip Muller Address of the Plaintiff's Attorney or the Plaintiff MULLER LAW LLC 47 WOOD AVENUE BARRINGTON RI 02806
Murray Judicial Complex Newport County 45 Washington Square Newport RI 02840 (401) 841-8330	Address of the Defendant 7750 Wisconsin Avenue Bethesda MD 20814

TO THE DEFENDANT, Marriott International, Inc.:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

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This Summons was generated on 10/27/2023.

/s/ John Graziano
Clerk

Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Plaintiff

Jane Doe

v.

Marriott International, Inc. et al.

Defendant**Civil Action File Number**

NC-2023-0376

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Marriott International, Inc., by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion _____
Address of dwelling house or usual place of abode _____
Age _____
Relationship to the Defendant _____
- ☐ With an agent authorized by appointment or by law to receive service of process.
Name of authorized agent _____
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.
Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: _____ / _____ / _____
Month Day Year

SERVICE FEE \$ _____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT
SUMMONS

Civil Action File Number NC-2023-0376	
Plaintiff Jane Doe v. Marriott International, Inc. et al. Defendant	Attorney for the Plaintiff or the Plaintiff Chip Muller Address of the Plaintiff's Attorney or the Plaintiff MULLER LAW LLC 47 WOOD AVENUE BARRINGTON RI 02806
Murray Judicial Complex Newport County 45 Washington Square Newport RI 02840 (401) 841-8330	Address of the Defendant 10400 Fernwood Road Bethesda MD 20817

TO THE DEFENDANT, Host Marriott Corporation:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 10/27/2023.

/s/ John Graziano
Clerk

Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Plaintiff

Jane Doe

v.

Marriott International, Inc. et al.

Defendant**Civil Action File Number**

NC-2023-0376

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, Host Marriott Corporation, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
Name of person of suitable age and discretion _____
Address of dwelling house or usual place of abode _____
Age _____
Relationship to the Defendant _____
- ☐ With an agent authorized by appointment or by law to receive service of process.
Name of authorized agent _____
If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.
Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
Name of person and designation _____



STATE OF RHODE ISLAND JUDICIARY
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: _____ / _____ / _____
Month Day Year

SERVICE FEE \$ _____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary
or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence,
and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____

STATE OF RHODE ISLAND
NEWPORT, SC.

SUPERIOR COURT

JANE DOE,
Plaintiff,

v.

C.A. No. _____

MARRIOTT INTERNATIONAL, INC.,
HOST MARRIOTT CORPORATION, and
MARRIOTT HOTEL SERVICES, LCC.,
Defendants.

COMPLAINT

SUMMARY

1. Defendant Marriott International, Inc., located at 7750 Wisconsin Avenue, Bethesda, MD 20814, with the agent for service listed as CT Corporation System, 450 Veterans Memorial Parkway, Suite 7A, East Providence, RI 02914.
2. Defendant Host Marriott Corporation, located at 10400 Fernwood Road, Bethesda, MD 20817-1109, with the agent for service listed as Prentice-Hall Corp System, 170 Westminster Street, Suite 900, Providence, RI 02903.
3. Defendant Marriott Hotel Services, LLC, located at 10400 Fernwood Road, Bethesda, MD 20817, with the agent for service listed as CT Corporation System, 450 Veterans Memorial Parkway, Suite 7A, East Providence, RI -02914.
4. Defendants employed F.B. as the director of rooms at the Newport Marriott. Marriott knew that F.B. had sexually harassed Marriott employees and guests. After leaving the Newport Marriott and working for other hotels, Marriott rehired F.B. with knowledge that he sexually harassed Marriott employees and guests in the past. After Marriott

rehired F.B., he raped Plaintiff Jane Doe after work. F.B.'s rape of Ms. Doe was a foreseeable consequence of Marriott's negligent decision to rehire F.B. After Ms. Doe reported F.B.'s rape of her, Marriott fired Ms. Doe in retaliation for her report of F.B.'s rape of her.

PARTIES

5. Jane Doe is a Rhode Island resident and worked for Marriott from June, 2021, to June, 2022.
6. Defendants Marriott International, Inc., Marriott Hotel Services, LLC., and Host Marriott Corporation, are Delaware companies based in Maryland doing business in Newport, Rhode Island, as the Newport Marriott (hereinafter collectively "Marriott").

FACTS

7. In approximately May, 2021, Marriott hired Ms. Doe as a front desk agent at the Marriott in Newport, Rhode Island.
8. Ms. Doe reported to F.B., the director of rooms in Newport at the time, and a long-time senior Marriott employee.
9. F.B. and Lisa Novelli promoted Ms. Doe to supervisor of front desk in January of 2022.
10. F.B. directly supervised Ms. Doe for approximately eleven months.
11. Marriott executives at the Newport Marriott knew that F.B. was a heavy drinker.
12. Marriott executives also knew that F.B. had a habit of making sexual advances toward female employees and guests.
13. Marriott first hired F.B. in approximately 2001, as the front desk agent at the Newport Marriott.
14. While employed by Marriott, F.B. sexually harassed a housekeeper.

15. Ms. Doe was informed that Walter Andrews, the long-time general manager of the Newport Marriott, gave an ultimatum to F.B.: that he resign or be fired for sexually harassing the housekeeper.
16. F.B. resigned.
17. Subsequently, F.B. worked for several more hotels over the course of years, including the Patriots' Place Marriott.
18. F.B. told Ms. Doe that while he was employed at the Patriots' Place Marriot, a housekeeper accused him of sexual harassment again.
19. And again, Marriott management told him to resign or be fired. Eventually, F.B. returned to the Newport area to work for other hotels.
20. In approximately, May, 2021, the Marriott rehired F.B. in Newport. Defendant named F.B. as Ms. Doe's supervisor.
21. Ms. Doe was informed that F.B. was welcomed back on the assumption that he had "grown up" since he was first asked to leave, and on the condition that he would not harass co-workers and subordinates.
22. F.B. had not changed.
23. For instance, F.B. would regularly tell Ms. Doe about his extra-marital affairs and nights of heavy drinking with women other than his wife.
24. F.B. would touch Ms. Doe in the workplace. F.B. would regularly touch Ms. Doe and invite Ms. Doe out for drinks.
25. Ms. Doe made it clear to him that she was not interested in any type of relationship beyond a professional friendship but could not avoid being near him at work because he supervised her.

26. F.B. is married, a father, and approximately 20 years older than Ms. Doe.

27. Ms. Doe complained to coworkers about F.B.'s constant comments and touching.

28. Soon thereafter, F.B. told Ms. Doe to tell her he had heard of her concerns and told her to go to him directly if she had any more concerns about his treatment of her.

29. Thereafter, F.B. treated Ms. Doe in a more collegial manner.

30. On or about March 24, 2022, F.B. invited Ms. Doe to join him and several coworkers from the Newport Marriott at a restaurant after work to celebrate F.B.'s birthday.

31. Ms. Doe had to work late, so Ms. Doe joined them at a bar after dinner.

32. D.S., the director of food and beverage at the Newport Marriott was present.

33. Almost immediately after Ms. Doe arrived and was seated next to D.S., F.B. suggested that Ms. Doe and kiss D.S. Ms. Doe refused.

34. Later that night, Ms. Doe lost consciousness at the bar.

35. Ms. Doe has a memory of regaining consciousness long enough to realize that she was in her bed and that F.B. was raping her. When she woke up in the morning, F.B. was still there, obviously very intoxicated. Ms. Doe's rectum was bleeding.

36. At approximately 8 a.m., F.B. left to go to work at the Marriott. Ms. Doe could not get out of bed. Despite all she'd been through, Ms. Doe eventually went to work at approximately 3 p.m., because she was dedicated to her job and wanted to make her evening shift. After she got to work, her condition worsened and eventually went to Newport Hospital where doctors administered a rape kit.

37. Ms. Doe reported F.B.'s rape of her to Marriott executives.

38. Upon information and belief, an investigation followed resulting in Marriott's termination of F.B.'s employment in approximately April, 2022.

39. Marriott did not inform Ms. Doe of what they learned in the course of their investigation of F.B. Ms. Doe learned of F.B.'s termination along with everyone else on her team at a quick meeting of her team.

40. Marriott HR never followed up with Ms. Doe about her report that F.B. raped her.

41. Subsequently, in the spring and summer of last year, the Newport Marriott was still short-staffed due to the nationwide worker shortage. F.B. was not immediately replaced. Almost all of F.B.'s work fell on Ms. Doe's shoulders. Ms. Doe gladly volunteered to work six days a week, upwards of 50 hours a week.

42. Due to the lack of staff, Ms. Doe was often called upon to perform many duties of the front office manager in addition to her front desk supervisory duties. Ms. Doe often covered overnight shifts and did double shifts for Marriott. Ms. Doe went above and beyond to help Marriott at this difficult time, and did her job well and reliably.

43. Marriott never gave her a written warning or negative performance evaluation.

44. On or about June 13, 2022, Ms. Doe received word that her boyfriend was in the middle of a serious medical emergency. At approximately 9:30 p.m., Ms. Doe informed coworkers about the emergency, that she wanted to check on him, and that she'd be right back. She rushed to her boyfriend's side as he happened to be only five minutes away. In approximately 30 minutes, she returned to work to finish her shift, and did so successfully.

45. A few days later, human resources informed Ms. Doe that she was being suspended for "falsifying company records" for not clocking out during those thirty minutes and because she had "inhibited guest satisfaction" because no one was in charge of the front desk for 30 minutes.

46. After a five-day suspension, Marriott fired Ms. Doe.

47. In August, 2023, the State of Rhode Island charged F.B. with first degree sexual assault.

COUNT ONE
NEGLIGENT HIRING, TRAINING, AND SUPERVISION

48. Ms. Doe repeats and incorporates by reference all allegations above and below as if restated here in full.

49. Defendants had a duty to provide a safe workplace for its workers, including Ms. Doe.

50. Defendants had a duty to not hire employees it knew were a danger to his coworkers.

51. Defendants had a duty to adequately train all employees to comply with company policies and state and federal laws governing the workplace.

52. Defendants had a duty to retain only those employees who are not a danger to their coworkers.

53. Defendants had a duty not to retain employees it knew were a danger to coworkers.

54. Defendants fired F.B. from his job at the Newport Marriott because F.B. sexually harassed a fellow employee.

55. Upon information and belief, F.B. sexually harassed a coworker while working for the Patriots' Place Marriott.

56. When Defendant rehired F.B. to work at the Newport Marriott again, it knew that F.B. had a track record of sexually harassing co-workers.

57. When Defendant rehired F.B. to work at the Newport Marriott again, it knew that F.B. had a track record of disregarding Marriott company policies prohibiting sexual harassment in the workplace.

58. When Defendant rehired F.B. to work at the Newport Marriott again, it knew that F.B. had a track record of ignoring state and federal laws which prohibit sexual harassment in the workplace.
59. When Defendant rehired F.B. to work at the Newport Marriott again, it knew that F.B. was a danger to coworkers.
60. After Defendant rehired F.B. to work at the Newport Marriott, it did nothing to adequately train F.B. on how to comply with the company's sexual harassment policies or state and federal laws regarding the prohibition of sexual harassment in the workplace.
61. When Defendant rehired F.B. to work at the Newport Marriott again, it did not take adequate steps to make sure that F.B. was not a threat to coworkers in the workplace.
62. F.B.'s rape of Ms. Doe was a foreseeable consequence of Marriott's decision to rehire F.B.
63. The Defendant's rehiring of F.B. in 2021 constitutes negligent hiring, negligent training, and negligent retention.
64. Defendants' negligent hiring, negligent training, and negligent retention caused Ms. Doe emotional distress for which Defendant is liable.
65. Ms. Doe's testimony that Defendants negligent hiring, negligent training, and negligent retention caused Ms. Doe emotional distress is truthful testimony.

Wherefore, Plaintiff asks this Honorable Court to:

- 1) Find in favor of Ms. Doe and enter an order finding Defendant liable;
- 2) Find Defendant responsible for Ms. Doe's damages including compensatory damages, back pay, reinstatement, front pay, emotional distress damages, punitive damages, and attorneys' fees and costs.

3) Enter an order with all other relief this Court deems mete and just.

COUNT TWO
RHODE ISLAND CIVIL RIGHTS ACT
RETALIATION

66. Ms. Doe repeats and incorporates by reference all allegations above and below as if restated here in full.

67. The Rhode Island Civil Rights Act prohibits retaliation for engaging in protected activity.

68. Ms. Doe's report of F.B.'s rape of her to Defendant constitutes protected activity.

69. Soon after Ms. Doe reported F.B.'s rape of her to Defendant, Defendants fired Ms. Doe's employment.

70. The justification Defendant offered to attempt to justify its termination of Ms. Doe's employment was false and pretextual.

71. Defendant fired Ms. Doe because she reported F.B.'s rape of her to Defendant.

72. Defendant is liable for violating RICRA.

73. Defendant's violation of the RICRA caused Ms. Doe damages, including emotional distress.

74. Ms. Doe's testimony that Defendant's violation of RICRA caused her emotional distress is truthful testimony.

Wherefore, Plaintiff asks this Honorable Court to:

4) Find in favor of Ms. Doe and enter an order finding each Defendant jointly and severally liable;

5) Find each Defendant responsible for Ms. Doe's damages including compensatory damages, back pay, reinstatement, front pay, emotional distress damages, punitive damages, and attorneys' fees and costs.

6) Enter an order with all other relief this Court deems mete and just.

Plaintiff,
JANE DOE,
By her Counsel,

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